

Deadline: May 28, 2015 @ 4:00 p.m. ET
No Hearing Requested

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

**CLAIMANTS' STATEMENT OF NO OBJECTION TO THE
DISALLOWANCE OF CERTAIN CLAIMS AND RESPONSE**

Epic Ventures, LLC ("Epic") and the eighteen individuals attached hereto as Exhibit A (collectively, the "Claimants"), by and through their undersigned attorneys, hereby submit their statement of no objection to the relief sought in the Trustee's Motion and Memorandum To Affirm His Determination Denying Claims of Claimants Holding Interests in Epic Ventures LLC [Docket No. 9933] (the "Motion") filed by Irving H. Picard (the "Trustee"), as Trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS").

The Claimants understand that the Trustee has obtained a number of rulings regarding the status of claimants, like the Claimants here, who did not hold accounts in the books and records of BLMIS in their own names. The request to disallow the Claimants' claims (other than the Epic claim¹) appears to fall within the requests granted in the other cases. Accordingly, the Claimants do not object to the relief requested by the Trustee's Motion.

The Claimants and Epic file this statement to clarifying misstatements and incorrect inferences in the Motion and accompanying declarations in an attempt to fit Claimants precisely within the rulings. It should be clear that the Claimants who deposited money with Epic did so expressly solely for the purpose of participating in BLMIS. None of the Claimants has a right to participate in any Epic investments or property other than funds deposited by them with BLMIS. Epic's management and accounting reflected that structure. In that regard, Epic was not organized or operated like a feeder fund and Claimants were unlike feeder fund investors.

Dated: New York, New York
May 27, 2015

DENTONS US LLP

By: /s/ Carole Neville
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¹ Epic filed a claim that has been allowed or deemed allowed but has not received any payments because the Trustee filed a preference claim against Epic. The preference claim was dismissed by the District Court in connection with its ruling on section 546(e).

EXHIBIT A

Claimant	Claim Number	Objection To Determination Docket Number	Counsel	Limited Liability Company Invested In	Limited Liability Company Account Number
Alexander A. Stein Trust	013374	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
George And Sarah Berman	013383	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Eric P. Stein IRA	013371	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Eric P. Stein Fbo Jonah M. Stein 1995 Trust	013373	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Mona And Alan Fisher	013381	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Greg Goldberg IRA	013386	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Joel Goldberg - Pension Profit Sharing Plan	013370	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Joel Goldberg - Pension Profit Sharing Plan (Not First Trust)	013384	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Marilyn And Edward Kaplan	013382	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Kerri Goldberg IRA	013387	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Lauren Goldberg IRA	013385	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Lena M. Stein Trust	013372	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Robert W. Renfield Living Trust	013380	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Elaine Roberts	013369	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Eric P Stein c/o Epic Ventures LLC	013378	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Loren W. Stein	013375	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Margot Stein	013376	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158
Sharon Stein	013377	3371	SNR Denton US LLP	Epic Ventures LLC	1E0158

CERTIFICATE OF SERVICE

I, Carole Neville, hereby certify that on May 27, 2015, I caused a true and correct copy of the foregoing **Defendants' No Objection to the Disallowance of Certain Claims and Statement in Response** on behalf of Epic Ventures and the Epic Ventures Individual Account holders to be filed electronically with the Court and served upon the parties in this action who receive electronic service through CM/ECF, and served first class mail upon:

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/s/ Carole Neville
Carole Neville